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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 MICHAEL CHEN,

14 Defendants.
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) Case No. CR 09-00149-MMC

) **STIPULATION AND [Proposed]**
) **ORDER REGARDING MOTION**
) **FOR BAIL PENDING APPEAL**
) **AND REPORT DATE**

1 Assistant United States Attorney Cynthia Stier, attorney of record for
2 Plaintiff United States of America, and Stanley L. Friedman, appellate counsel of
3 record for Defendant Michael Chen, hereby stipulate as follows:

4 Defendant will file his anticipated Motion for Bail Pending Appeal on or
5 before March 6, 2013.

6 The Government will file its opposition to Defendant's Motion for Bail
7 Pending Appeal on or before March 20, 2013.

8 Defendant will file any reply memorandum to his Motion for Bail Pending
9 Appeal on or before March 28, 2013.

10 Defendant will notice the Motion for Bail Pending Appeal for hearing on
11 April 3, 2013.

12 The date upon which Defendant Michael Chen shall surrender for service of
13 sentence at the institution designated by the Bureau of Prisons shall be extended
14 from March 27, 2013 to April 10, 2013 at 2:00 p.m.

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17 Dated: February 27, 2013.

/s/ Stanley L. Friedman
Stanley L. Friedman
Attorney for Defendant
Michael Chen

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21 Dated: February 27, 2013.

/s/ Cynthia Stier
Cynthia Stier
Assistant United States Attorney
Attorney for Plaintiff
United States of America

O R D E R

The Court, having read the stipulation of the parties, and finding Good Cause therein, hereby orders as follows:

Defendant will file his anticipated Motion for Bail Pending Appeal on or before March 6, 2013.


The Government will file its opposition to Defendant's Motion for Bail Pending Appeal on or before March 20, 2013.

Defendant will file any reply memorandum to his Motion for Bail Pending Appeal on or before March 28, 2013.

Defendant will notice the Motion for Bail Pending Appeal for hearing on April ¹⁰~~8~~, 2013.

The date upon which Defendant Michael Chen shall surrender for service of sentence at the institution designated by the Bureau of Prisons shall be extended from March 27, 2013 to April ¹⁷~~10~~, 2013 at 2:00 p.m.

Dated: February 28, 2013


The Honorable Maxine M. Chesney
Senior United States District Court Judge